

# EXHIBIT B

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*Attorneys for Defendant Zuffa, LLC, d/b/a*  
*Ultimate Fighting Championship and UFC*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN JOSE DIVISION

Cung Le, Nathan Quarry, Jon Fitch, on behalf  
of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

Defendant.

Case No. 5:14-cv-05484 EJD

**DEFENDANT ZUFFA LLC'S INITIAL  
DISCLOSURES PURSUANT TO FRCP  
26(A)(1)**

Luis Javier Vazquez and Dennis Lloyd Hallman, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,

Defendant.

Case No. 5:14-cv-05591 EJD

Brandon Vera and Pablo Garza, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,

Defendant.

Case No. 5:14-cv-05621 EJD

Gabe Ruediger and Mac Danzig, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,

Defendant.

Case No. 5:15-cv-00521 EJD

Kyle Kingsbury and Darren Uyenoyama, on  
behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

Defendant.

Case No. 3:15-cv-01324 EJD

**PRELIMINARY STATEMENT**

Pursuant to Federal Rule of Civil Procedure 26(a)(1), defendant Zuffa, LLC (“Zuffa”) hereby makes the following initial disclosures. Zuffa has made a reasonable and good faith effort to prepare the disclosures set forth herein. However, Zuffa has not completed its review of the evidence in connection with this case. Consequently, other potential witnesses, subjects of information, and/or categories of documents within the scope of these disclosures may be identified as discovery proceeds and as the case develops. Therefore, Zuffa, reserves the right to modify, amend, or supplement these disclosures at a later time as appropriate, and at any time before trial in this matter.

These disclosures are made without waiving: (i) the right to object on the grounds of competency, the attorney-client privilege, attorney work-product protections, undue burden, relevancy, materiality, hearsay or any other proper ground; (ii) the right to object to the production or use of any information, for any purpose, in whole or in part, in any proceeding in this or any other action; or (iii) the right to object on any and all grounds, at any time, to any other discovery request or proceeding involving or relating to the subject matter of these disclosures.

**I. FRCP 26(a)(1)(A)(i): Individuals**

Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(i), the chart below sets forth (1) the individuals, not including expert witnesses, that Zuffa has identified who are likely to have discoverable information that Zuffa may use to support its denials or defenses; and (2) to the extent reasonably determinable by Zuffa at this time, the subjects of the information about which these individuals may have knowledge. Zuffa has attempted to provide complete information regarding the subjects about which the identified individual has knowledge, but the individual may have knowledge of subjects in addition to, or other than, those listed. References to an individual’s employment title refers either to the individual’s current or prior title.

INDIVIDUAL	TITLE	CONTACT INFORMATION	SUBJECT MATTER
Lorenzo Fertitta	Chairman and Chief Executive Officer, Zuffa, LLC	c/o Boies, Schiller & Flexner LLP 1999 Harrison Street Suite 900 Oakland, CA 94612 Tel: (510) 874-1000	Mr. Fertitta is likely to have information about competition, the history of the UFC, Zuffa's business model, and issues related to Zuffa's relationships with fighters, event venues, sponsors, media outlets, and other partners.
Dana White	President, Zuffa, LLC	c/o Boies, Schiller & Flexner LLP 1999 Harrison Street Suite 900 Oakland, CA 94612 Tel: (510) 874-1000	Mr. White is likely to have information about competition, the history of the UFC, Zuffa's business model, and issues related to Zuffa's relationships with fighters, event venues, sponsors, media outlets, and other partners.
Ike Lawrence Epstein	Senior Executive Vice President and Chief Operating Officer, Zuffa, LLC	c/o Boies, Schiller & Flexner LLP 1999 Harrison Street Suite 900 Oakland, CA 94612 Tel: (510) 874-1000	Mr. Epstein is likely to have information about competition, the history of the UFC, Zuffa's business model, and issues related to Zuffa's relationships with fighters, event venues, sponsors, media outlets, and other partners.
Kirk Hendrick	Executive Vice President and Chief Legal Officer, Zuffa LLC	c/o Boies, Schiller & Flexner LLP 1999 Harrison Street Suite 900 Oakland, CA 94612 Tel: (510) 874-1000	Mr. Hendrick is likely to have information about competition, the history of the UFC, Zuffa's business model, and issues related to Zuffa's relationships with fighters, event venues, sponsors, media outlets, and other partners.

Peter Dropick	Senior Vice President, Event Development and Operations, Zuffa, LLC	c/o Boies, Schiller & Flexner LLP 1999 Harrison Street Suite 900 Oakland, CA 94612 Tel: (510) 874-1000	Mr. Dropick is likely to have information about competition, the development of sports entertainment events, and Zuffa LLC's relationships with event venues.
Mike Mossholder	Senior Vice President, Global Marketing Partnerships, Zuffa LLC	c/o Boies, Schiller & Flexner LLP 1999 Harrison Street Suite 900 Oakland, CA 94612 Tel: (510) 874-1000	Mr. Mossholder is likely to have information about competition and Zuffa's relationships with the UFC's marketing partners.

Other parties and individuals are also likely to have discoverable information that Zuffa may use to support its defenses. These include the individuals listed below. In addition to those individuals, Zuffa expressly incorporates into these Initial Disclosures all of the individuals and entities that have been identified in the initial disclosures or other discovery responses of any plaintiff in this action as individuals or entities likely to have discoverable information.

INDIVIDUAL	CONTACT INFORMATION IF KNOWN	SUBJECT MATTER
Cung Le	c/o Joseph Saveri Law Firm, Inc. 505 Montgomery Street, Suite 625 San Francisco, California 9411 Tel.: (415) 500-6800	Mr. Le is likely to have information regarding the alleged basis for his claims in this matter.
Jon Fitch	c/o Joseph Saveri Law Firm, Inc. 505 Montgomery Street, Suite 625 San Francisco, California 9411 Tel.: (415) 500-6800	Mr. Fitch is likely to have information regarding the alleged basis for his claims in this matter.
Nathan Quarry	c/o Joseph Saveri Law Firm, Inc. 505 Montgomery Street, Suite 625 San Francisco, California 9411 Tel.: (415) 500-6800	Mr. Quarry is likely to have information regarding the alleged basis for his claims in this matter.
Pablo Garza	c/o Joseph Saveri Law Firm, Inc. 505 Montgomery Street, Suite 625 San Francisco, California 9411 Tel.: (415) 500-6800	Mr. Garza is likely to have information regarding the alleged basis for his claims in this matter.

1	Luis Javier Vasquez	c/o Joseph Saveri Law Firm, Inc. 505 Montgomery Street, Suite 625 San Francisco, California 9411 Tel.: (415) 500-6800	Mr. Vasquez is likely to have information regarding the alleged basis for his claims in this matter.
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3	Brandon Vera	c/o Joseph Saveri Law Firm, Inc. 505 Montgomery Street, Suite 625 San Francisco, California 9411 Tel.: (415) 500-6800	Mr. Vera is likely to have information regarding the alleged basis for his claims in this matter.
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5	Dennis Hallman	c/o Joseph Saveri Law Firm, Inc. 505 Montgomery Street, Suite 625 San Francisco, California 9411 Tel.: (415) 500-6800	Mr. Hallman is likely to have information regarding the alleged basis for his claims in this matter.
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7	Gabe Ruediger	c/o Joseph Saveri Law Firm, Inc. 505 Montgomery Street, Suite 625 San Francisco, California 9411 Tel.: (415) 500-6800	Mr. Ruediger is likely to have information regarding the alleged basis for his claims in this matter.
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9	Mac Danzig	c/o Joseph Saveri Law Firm, Inc. 505 Montgomery Street, Suite 625 San Francisco, California 9411 Tel.: (415) 500-6800	Mr. Danzig is likely to have information regarding the alleged basis for his claims in this matter.
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11	Kyle Kingsbury	c/o Joseph Saveri Law Firm, Inc. 505 Montgomery Street, Suite 625 San Francisco, California 9411 Tel.: (415) 500-6800	Mr. Kingsbury is likely to have information regarding the alleged basis for his claims in this matter.
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13	Darren Uyenoyama	c/o Joseph Saveri Law Firm, Inc. 505 Montgomery Street, Suite 625 San Francisco, California 9411 Tel.: (415) 500-6800	Mr. Uyenoyama is likely to have information regarding the alleged basis for his claims in this matter.
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15	Gary Ibarra	AMR Group 151 Verde Mesa Drive Danville, CA 94526	Mr. Ibarra is likely to have information regarding athletes' relationships with Zuffa, other promoters, venues, and sponsors and competition in the industry.
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17	Suzanne Le	1633 Nord Lane San Jose, CA 95125	Ms. Le is likely to have information regarding Cung Le's relationships with Zuffa, other promoters, venues, and sponsors.
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19	Brandon Bittner	Bittner & Hahs, P.C. 4949 S.W. Meadows Road, Suite 260 Lake Oswego, OR 97035	Mr. Bittner is likely to have information regarding Nathan Quarry's and other athletes' relationships with Zuffa, other promoters, venues, and sponsors and competition in the industry.
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1	Matt Stansell	1716 Forest Avenue Carlsbad, CA 92008	Mr. Stansell is likely to have information regarding athletes' relationships with Zuffa, other promoters, venues, and sponsors, and competition in the industry.
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4	Bob Cook	5 River Park Place West Suite 203 Fresno, CA 93720	Mr. Cook is likely to have information regarding athletes' relationships with Zuffa, other promoters, venues, and sponsors, and competition in the industry.
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8	Audie Attar	2203 Watermarke Place Irvine, CA 92612	Mr. Attar is likely to have information regarding athletes' relationships with Zuffa, other promoters, venues, and sponsors, and competition in the industry.
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11	Rose Gracie	c/o Joseph Saveri Law Firm, Inc. 505 Montgomery Street, Suite 625 San Francisco, California 9411 Tel.: (415) 500-6800	Ms. Gracie is likely to have information regarding Javier Vazquez's relationships with Zuffa, other promoters, venues, and sponsors and competition in the industry.
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15	Monte Cox	<a href="mailto:fiteiowa@aol.com">fiteiowa@aol.com</a>	Mr. Cox is likely to have information regarding athletes' relationships with Zuffa, other promoters, venues, and sponsors, and competition in the industry.
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19	Shu Hirata	<a href="mailto:shu@suckerpunchent.com">shu@suckerpunchent.com</a>	Mr. Hirata is likely to have information regarding athletes' relationships with Zuffa, other promoters, venues, and sponsors, and competition in the industry.
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22	Jason Genet	Ingrained Media 618 Castillo St. Santa Barbara, CA 93101 <a href="mailto:jason@ingrainedmedia.com">jason@ingrainedmedia.com</a>	Mr. Genet is likely to have information regarding athletes' relationships with Zuffa, other promoters, venues, and sponsors, and competition in the industry.
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Third Parties		
INDIVIDUAL	CONTACT INFORMATION IF KNOWN	SUBJECT MATTER
World Series of Fighting	4631 S. Dean Martin Dr., Ste. 100, Las Vegas, NV 89103 702-527-5593	The World Series of Fighting is likely to have information related to the relevant market definition, access to fighters, venues, sponsors, and television distribution outlets, and competition.
Top Rank, Inc.	748 Pilot Rd. Las Vegas, NV 89119 702-732-2717	Top Rank, Inc. is likely to have information related to the relevant market definition, access to fighters, venues, sponsors, and television distribution outlets, and competition.
Wynn Las Vegas	3131 Las Vegas Blvd. South Las Vegas, NV 89105 702-770-2105	Wynn Las Vegas is likely to have information related to the relevant market definition, access to fighters, venues, sponsors, and television distribution outlets, and competition.
Lion Fight Promotions	7785 Buckwood Ct. Las Vegas, NV 89149 702-658-7094	Lion Fight Promotions is likely to have information related to the relevant market definition, access to fighters, venues, sponsors, and television distribution outlets, and competition.
Bellator Sport Worldwide LLC	5000 Birch Street, Newport Beach, CA 92660 949-222-3400	Bellator is likely to have information related to the relevant market definition, access to fighters, venues, sponsors, and television distribution outlets, and competition.
Resurrection Fighting Alliance	c/o Sven E. Bean Chief Operating Officer PO Box 460293 Aurora, CO 80046	Resurrection is likely to have information related to the relevant market definition, access to fighters, venues, sponsors, and television distribution outlets, and competition
Titan Fighting Championship, LLC	2800 Gateway Drive, Pompano Beach, FL 33069	Titan is likely to have information related to the relevant market definition, access to fighters, venues, sponsors, and television distribution outlets, and competition.

Legacy Fighting Championship, LLC	10380 SW Village Center Dr #315 Port Saint Lucie, FL 34987	Legacy is likely to have information related to the relevant market definition, access to fighters, venues, sponsors, and television distribution outlets, and competition.
Invicta Fighting Championships LLC	5360 College Blvd Suite 200 Overland Park, KS 66211	Invicta is likely to have information related to the relevant market definition, access to fighters, venues, sponsors, and television distribution outlets, and competition
MGM Grand Hotel & Casino	3799 Las Vegas Blvd. South Las Vegas, NV 89109 702-891-1111	MGM Grand is likely to have information regarding the relevant market definition, contracts with sports and entertainment promoters, and competition.
Mandalay Bay Hotel & Casino	3950 Las Vegas Blvd. South Las Vegas, NV 89119 702-632-7777	Mandalay Bay is likely to have information regarding the relevant market definition, contracts with sports and entertainment promoters, and competition.
Palms Casino Resort	4321 W. Flamingo Rd. Las Vegas, NV 89103 702-942-7777	The Palms is likely to have information regarding the relevant market definition, contracts with sports and entertainment promoters, and competition.
The Hard Rock Hotel & Casino	4455 Paradise Rd. Las Vegas, NV 89169 702-693-5000	The Hard Rock Hotel & Casino is likely to have information regarding the relevant market definition, contracts with sports and entertainment promoters, and competition.
Planet Hollywood Las Vegas Resort & Casino	3667 Las Vegas Blvd. South Las Vegas, NV 89109 866-919-7472	Planet Hollywood is likely to have information regarding the relevant market definition, contracts with sports and entertainment promoters, and competition.
Sam Boyd Stadium	4505 S. Maryland Pkwy, Box 450003 Las Vegas, NV 89154 702-895-3761	Sam Boyd Stadium is likely to have information regarding the relevant market definition, contracts with sports and entertainment promoters, and competition.
The Orleans Hotel & Casino	4500 W. Tropicana Ave. Las Vegas, NV 89103 702-365-7111	The Orleans is likely to have information regarding the relevant market definition, contracts with sports and entertainment promoters, and competition.

1 2 3	Thomas & Mack Center	4505 S. Maryland Pkwy, Box 450003 Las Vegas, NV 89154 702-895-3761	Thomas & Mack Center is likely to have information regarding the relevant market definition, contracts with sports and entertainment promoters, and competition.
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## II. FRCP 26(a)(1)(A)(ii): Documents

Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(ii), Zuffa identifies the following categories and locations of documents as likely to contain information relevant to disputed matters in this case that Zuffa may use to support its claims or defenses, unless solely for impeachment. These disclosures relate solely to documents within Zuffa's possession, custody, or control. The categories below reflect those that Zuffa has identified as of the date of this disclosure and may not reflect all categories of documents in Zuffa's possession, custody, or control. Zuffa reserves the right to supplement or amend these categories. By setting forth this information, Zuffa does not admit the relevance or admissibility of any category or any document in any category; nor does Zuffa acknowledge that any request for documents comprising all or part of any of these categories would be reasonably calculated to lead the discovery of admissible evidence in this case, or that the request is otherwise appropriate. Zuffa expressly reserves the right to object to and/or withhold production of any documents in any of the categories set forth below. These documents are in the form of electronically stored information or hard copy documents. Zuffa reserves the right to use any relevant evidence in support of its claims or defenses, regardless of the categories listed below.

### A. Categories of documents

- Documents related to competition in the promotion of sports and entertainment events and content.
- Documents related to competition for the services of athletes.
- Documents related to competition for and by sponsors for sports and entertainment events and content.
- Documents related to competition for and by merchandisers for sports and entertainment events and content.

- Documents related to competition for and by media distribution channels for sports and entertainment events and content.
- Documents related to competition for and by physical venues for sports and entertainment events.

#### **B. Locations of documents**

The above categories of documents include Zuffa's electronic and hard-copy documents. The electronic documents are located on the computer systems for Zuffa and on individual media. Documents potentially related to Plaintiffs' complaints are located at Zuffa's headquarters at 2960 West Sahara Avenue Las Vegas, Nevada 89102. Zuffa's investigation is ongoing. If, as the case develops, Zuffa identifies additional documents or categories of documents in its possession, custody or control that supports its position, it will identify them in supplemental disclosures as required under Fed. R. Civ. P. 26(e).

#### **III. FRCP 26(a)(1)(A)(iii): Damages**

Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(iii), other than fees and costs to which it may be entitled under applicable law, Zuffa does not seek damages for this matter from Plaintiffs at this time.

#### **IV. FRCP 26(a)(1)(A)(iv): Insurance**

Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(iv), subject to applicable protections under a protective order, Zuffa will make any such agreement(s) available to Plaintiffs.

**V. FRCP 26(g): Certification**

Pursuant to Fed. R. Civ. P. 26(g)(1), the undersigned counsel certifies that to the best of its knowledge, information, and belief, formed after an inquiry that is reasonable under the circumstances, these initial disclosures are complete and correct as of the time Zuffa makes them.

Dated: May 8, 2015

BOIES, SCHILLER & FLEXNER LLP

By: /s/ John F. Cove, Jr.  
John F. Cove, Jr.

*Attorneys for Defendant Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC*

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